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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MAX ULRICH and RYAN SCHAVRIEN,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

ABBOTT LABORATORIES,  
Defendant.

Case No. 3:24-cv-09452- RFL

**DECLARATION OF WILLIAM J. TRACH  
IN SUPPORT OF DEFENDANT ABBOTT  
LABORATORIES' MOTION TO DISMISS  
PLAINTIFFS' FIRST AMENDED CLASS  
ACTION COMPLAINT**

Date: August 19, 2025  
Time: 10:00 AM  
Courtroom: 15  
Hon. Rita F. Lin

**DECLARATION OF WILLIAM J. TRACH**

I, William J. Trach, declare as follows:

1. I am a partner of the law firm of Latham & Watkins LLP, located at 200 Clarendon Street, Boston, MA 021160, and an attorney duly admitted *pro hac vice* to practice before this Court in the above-captioned action. I am counsel for Defendant Abbott Laboratories (“Abbott”).

2. I make this declaration in support of Abbott’s Motion to Dismiss Plaintiffs’ Class Action Complaint.

3. Attached hereto as **Exhibit A** are true and correct copies of Abbott’s Similac Go & Grow labels.

4. Attached hereto as **Exhibit B** are true and correct copies of Abbott’s PediaSure labels.

5. Attached hereto as **Exhibit C** is a true and correct copy of the *VanCleave* Verdict Form dated February 21, 2025.

6. Attached hereto as **Exhibit D** is a true and correct copy of the article Older Infant-Young Child “Formulas,” published in November 2023.

7. Attached hereto as **Exhibit E** is a true and correct copy of the article Decreasing Community Toddler Formula Use, published April 14, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of May 2025 in Boston, Massachusetts.

/s/ William J. Trach  
William J. Trach